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April 12, 2017

**VIA ECF**

Honorable Ronnie Abrams  
United States District Judge  
United States District Court  
40 Foley Square, Room 1506  
New York, NY 10007

Re: *de Lacour, et al. v. Colgate-Palmolive Co. and Tom's of Maine Inc.*,  
Case No. 1:16-cv-08364 (RA)

Dear Judge Abrams:

The parties in the above-captioned matter write to request an extension of time for certain deadlines in the Case Management Plan and Scheduling Order (Dkt. No. 27) ("Scheduling Order"), and jointly submit the following letter.<sup>1</sup>

Under the current Scheduling Order, the parties shall complete initial Rule 26(a)(1) disclosures and submit an ESI protocol and proposed protective order by April 14, 2017, and serve initial requests for production of documents, interrogatories, and requests for admission by April 17, 2017.

As a result of spring break for many schools, Defendants' in-house personnel have been on vacation, particularly this week, which is both Passover and Easter. Therefore, Defendants requested, and Plaintiffs agreed, to a one-week extension to the April 14, 2017 and April 17, 2017 deadlines in the Scheduling Order mentioned above. The one week extension will facilitate continued negotiation over the ESI protocol and proposed protective order, drafts of which Defendants sent to Plaintiffs on April 5, 2017, as well as allow Defendants' in-house personnel to better advise counsel as to the initial discovery requests.

Under the requested extension of time, the new deadlines would be as follows:

- Initial disclosures pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure shall be completed no later than April 21, 2017 (previously April 14, 2017).

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<sup>1</sup> Latham & Watkins LLP has obtained consent to sign on behalf of all counsel of record in accordance with Rule 8.5(b) of the Court's ECF Rules and Instructions.

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- The parties shall submit an ESI protocol and proposed protective order by April 21, 2017 (previously April 14, 2017).
- Initial requests for production of documents, interrogatories, and requests for admission shall be served by April 24, 2017 (previously April 17, 2017).
- All other dates in the Scheduling Order would remain the same.

Defendants previously requested an extension of time to answer or otherwise respond to the First Amended Complaint and an extension of the proposed case management plan and scheduling order. (Dkt No. 11). The Court granted both of the requested extensions. (Dkt. No. 12).

Thank you for your consideration.

Respectfully submitted,

LATHAM & WATKINS LLP

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